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## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

35-02 MA

ALLFIRST BANK,

CIVIL ACTION NO. 1:01-CV-786

(Honorable Sylvia H. Rambo)

Plaintiff,

.

FILED HARRISBURG

JOHN M. ORTENZIO,

v.

:

MAR 0 4 2002

Defendant.

Per\_\_\_\_\_\_DEPUTY CLERK

## **JOINT MOTION FOR CONTINUANCE**

The parties, though their undersigned attorneys, hereby move for a ten day extension of the time in which depositions of the parties' respective experts may be taken up to and including March 14, 2002 and in support thereof, state as follows:

- 1. Pursuant to the Case Management Order entered on October 30, 2001, discovery was to be completed by March 4, 2002
- 2. The parties have had difficulty scheduling dates for their respective experts' depositions prior to March 4, 2002. Accordingly, the parties respectfully request an extension of the March 4, 2002 discovery cut-off date solely for the purpose of taking the depositions of the parties' experts. The parties respectfully request that time in which to take the experts' depositions be extended up to and including March 14, 2002. All other dates in the Case Management Order shall remain unchanged.
  - 3. Neither party will be prejudiced by the granting of this continuance.

WHEREFORE, the parties respectfully request this Honorable Court enter an Order granting this Motion.

Respectfully submitted,

GEBHARDT & SMITH LLP

BLANK ROME COMISKY & McCAULEY LLP

Lawrence J. Gebhardt

The World Trade Center, 9th Floor

Baltimore, MD 21202

(410) 385-5100

Attorneys for Plaintiff Allfirst Bank BY:

Edward I. Swichar Robert A. Burke One Logan Square Philadelphia, PA 19103 (215) 569-5500

Attorneys for Defendant John M. Ortenzio

Dated: February 28, 2002

WHEREFORE, the parties respectfully request this Honorable Court enter an Order granting this Motion.

Respectfully submitted,

GEBHARDT & SMITH LLP

BY:

Lawrence J. Gebhardt The World Trade Center, 9th Floor Baltimore, MD 21202 (410) 385-5100

Attorneys for Plaintiff Allfirst Bank

Dated: March 1, 2002

BLANK ROME COMISKY & McCAULEY LLP

BY:

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Attorneys for Defendant John M. Ortenzio Case 1:01-cv-00786-SHR Document 36 Filed 03/04/2002 Page 4 of 4

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the within Joint Motion for Continuance was served this 1st day of March, 2002, by telecopy and regular mail, upon the following:

Lawrence J. Gebhardt, Esquire Gebhardt & Smith LLP The World Trade Center, 9th Floor Baltimore, MD, 21202 Attorneys for Plaintiff

ROBERT A. BURKE